

# **SDMS US EPA REGION V -1**

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141104

By Overnight Courier

August 7, 1987

Ms. Janet Haff  
U. S. Environmental Protection Agency  
5HE-12  
230 S. Dearborn Street  
Chicago, Illinois 60604

RECEIVED  
AUG 10 1987  
U.S. EPA. REGION V  
WASTE MANAGEMENT DIVISION  
HAZARDOUS WASTE ENFORCEMENT BRANCH

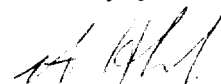
RE: Response to Request for Information regarding [REDACTED]

Dear Ms. Haff:

Enclosed is the response of [REDACTED] to the EPA's letter of June 23, 1987 requesting information relating to the disposal of hazardous and other substances at the Brookfield Sanitary Landfill (formerly the Loth Disposal Site) in Brookfield, Wisconsin from 1950 to 1981. As you can see from the response, GE Medical Systems has no knowledge or documents relating to the use of the Brookfield site, for hazardous or non-hazardous wastes. You will note that while GE Medical Systems did have arrangements with some of the haulers you referred to in our phone conversation for trash removal during the relevant time period, those haulers did not handle hazardous wastes for GE Medical Systems under such arrangements, and we have no knowledge or information that such haulers took our trash to the Brookfield site.

The response begins on the attached letterhead sheets, and contains several attachments and exhibits.

Sincerely yours,



Robert H. Klein, Jr.  
Counsel

RHK/lc  
5079A  
Attachments

August 7, 1987

Response of General Electric Medical Systems Group  
to EPA Request for Information regarding Brookfield  
Sanitary Landfill.

General

This response relates to the facilities of General Electric Medical Systems identified on attached Exhibit A. GE Medical Systems also operates in Wisconsin the facilities identified in Exhibits B and C, but those sites have not been included in this response due to the fact that those facilities shown on Exhibit B are not, and were not during the period 1950-1981, classified as generators of hazardous substances, pollutants or contaminants as defined under Section 101 of CERCLA, and those facilities shown on Exhibit C were not in operation by GE Medical Systems during the period 1950 to 1981.

Each facility shown in Exhibits A, B, and C is identified by a double letter (such as AA, BB, CC etc.). For ease of reference, where a particular facility is identified in response to a Request for Information, it is identified by its double letter identifier.

Also contained in Exhibit A are the EPA identification numbers for each facility to which this response applies, and the identity and description of job responsibilities for the person or persons consulted with respect to gathering information relative to that facility. Additional persons consulted are identified below.

Responses to Specific Requests

Request 1

See Exhibit A. Also consulted was:

Dennis Hussey  
Group Industrial Hygienist, Group Environmental Coordinator.  
Responsible for coordination of industrial hygiene activities and  
environmental programs for GE Medical Systems.  
3000 N. Grandview Blvd., Waukesha, Wisconsin.

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Additional employees within GE Medical Systems Procurement and Plant Engineering departments who it was believed may have had knowledge pertinent to this Request for Information were consulted.

Request 2

Waste manifests, purchase orders, requests for shipping, and similar documents were examined in response to this request for information. The review of such documents and consultation with the people identified in response to Request 1 above revealed no information that hazardous substances or other materials were disposed of at the Brookfield site.

Notwithstanding the answer above, it is understood that based on a conversation between Janet Haff of the EPA and Robert Klein of GE Medical Systems, Waste Management, Inc., and its haulers, Acme Disposal, Best Disposal, and United Waste Systems, have indicated to the EPA that they may have hauled to the Brookfield site paper trash, wood skids and the like from GE Medical Systems. Although this was not confirmed by our review in response to this Request for Information, documents which indicate relationships between GE Medical Systems and those persons during the relevant time period are identified and attached hereto as Exhibit D.

Request 3

Waste Management of Wisconsin  
W124 N9451 Boundary Road  
Menominee Falls, WI 53051

Best Disposal  
10627 S. 27th Street  
Franklin, WI 53132

United Waste Systems  
W124 N8925 Boundary Road  
Menomonee Falls, WI 53051

The persons identified above may be able to provide supplemental information as to the arrangements with GE Medical Systems under which those persons hauled and disposed of non-hazardous trash generated by GE Medical Systems and the destinations to which those persons hauled and disposed of such trash.

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Request 4

See Exhibits A and C.

Request 5

GE Medical Systems has no direct knowledge of acts or omissions as referenced in this Request.

Request 6

During the period of site operation identified in the Request for Information, General Electric Company maintained insurance policies from on or about 1956 to 1981 in various amounts. Some of those policies contained pollution exclusion clauses. Based on past experience, GE Medical Systems expects its insurance carrier to deny coverage for claims relating to the release of hazardous substances at sites such as the Brookfield site. Nonetheless, at present GE Medical Systems does not intend to raise the issue of financial inability in relation to this Request for Information.

Request 7

GE Medical Systems has no direct knowledge of anyone, including itself, who may have arranged for disposal or treatment, or arranged for transportation for disposal or treatment of any waste materials, including hazardous substances, at the Brookfield site or to the Brookfield site.

The facilities identified in Exhibit A hereto were put into operation on or about the following dates: Facility AA, 1946; Facility BB, 1972; Facility CC, 1970; Facility DD, 1974; Facility EE, 1977; Facility FF, 1972. For some time prior to 1981, GE Medical Systems maintained relationships with the persons identified in response to Request 3 above to haul and dispose of non-hazardous trash and other non-hazardous substances from the facilities shown in Exhibit A. The arrangements made with these persons did not specify or require the contractors to notify GE Medical Systems of the destinations to which such non-hazardous trash or other non-hazardous substances were taken for disposal. GE Medical Systems has no direct knowledge, information or documents which indicate that such persons disposed of such non-hazardous trash or other non-hazardous substances at the Brookfield Sanitary Landfill during the time period of such relationships through 1981. GE Medical Systems further has no knowledge, information, or documents which indicates that those persons identified in response to Request 3 above disposed of hazardous substances for GE Medical Systems under the arrangements described above.

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Response of General Electric Medical Systems Group  
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Request 7a

See response to Request 3 above.

Request 7b

GE Medical Systems cannot determine each date on which the arrangements identified in response to Request 7 were made. GE Medical Systems maintained arrangements for the disposal of non-hazardous trash and non-hazardous wastes with the persons identified in response to Request 3 over some period to 1985. As indicated above, the majority of facilities to which this response relates were not put into operation until 1970 or later. All documents presently available to GE Medical Systems which may indicate dates during the period to which this Request for Information relates on which such non-hazardous trash or non-hazardous wastes were disposed of by the persons identified in response to Request 3 are attached as part of Exhibit D hereto.

Request 7c

The general nature of the waste material disposed of as indicated in response to Request 7 above was paper trash, wood skids, mixed solid non-hazardous wastes, food wastes, etc. All documents presently available to GE Medical Systems which may indicate the nature of such wastes disposed of in any particular transaction during the time period to which this Request for Information relates are attached as part of Exhibit D hereto.

The processes which generated such non-hazardous trash or other non-hazardous wastes included general office operation, food services operation, and manufacturing and assembly of medical diagnostic imaging equipment.

Request 7d

The owner of the non-hazardous trash and other non-hazardous wastes referred to in response to Request 7 was GE Medical Systems.

Request 7e

GE Medical Systems cannot determine the quantity of such non-hazardous trash or other non-hazardous wastes involved in each transaction or in total with respect to the arrangements referred to in response to Request 7. All documents presently available to GE Medical Systems which may establish quantities of such materials with respect to individual transactions which took place during the time period to which this Request for Information relates are attached as part of Exhibit D hereto.

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Request 7f

To the best of the knowledge of GE Medical Systems, no tests, analyses, or analytical results concerning the materials referred to in response to Request 7 were conducted.

Request 7g

It is unknown to GE whether any of the materials referred to in response to Request 7 were disposed of at the Brookfield Sanitary Landfill. GE Medical Systems did not select or specify the Brookfield site as the place to which such materials were to be transported. If any of the materials identified in response to Request 7 above were transported to the Brookfield site, the persons identified in response to Request 3 above would have selected the site as the destination.

Request 7h

GE Medical Systems cannot establish the amount paid in relation to each transaction resulting from the arrangements referred to in response to Request 7 above. Any documents presently available to GE Medical Systems which may establish the price paid in relation to such arrangements during the time period to which this Request for Information relates are attached as part of Exhibit D hereto. Payment for the arrangements referred to in response to Request 7 above would have been made by the Accounts Payable Operation of GE Medical Systems and would have been made in the form of checks.

Request 7i

This information is unknown to GE Medical Systems for the reasons specified in response to Request 7g above.

Request 7j

This information is unknown to GE Medical Systems.

Request 7k

This information is unknown to GE Medical Systems. Note that as indicated in response to Requests 7 and 7g above, GE Medical Systems has no information whatsoever which establishes that the materials referred to in response to Request 7 were disposed of at the Brookfield site.

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Response of General Electric Medical Systems Group  
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Request 7l

This information is unknown to GE Medical Systems.

Request 7m

The arrangements referred to in response to Request 7 did not require the persons identified in response to Request 3 above to identify to GE Medical Systems the actual methods, means, and site of disposal of the non-hazardous trash and other non-hazardous wastes referred to in response to Request 7 above.

Request 7n

The type and number of all containers in which the materials referred to in response to Request 7 above were contained after the materials left the premises of GE Medical Systems is unknown to GE Medical Systems. Such materials were generally stored by GE Medical Systems in dumpsters and were generally placed by the contractors referred to in response to Request 3 above in garbage disposal trucks. All documents presently available to GE Medical Systems which identify the types of containers in which such materials were contained during the time period to which this Request for Information relates are attached as part of Exhibit D hereto.

Request 7o

See response to Request 7h above.

Request 7p

See Exhibit D.

Request 7q

GE Medical Systems cannot identify all persons with knowledge, information or documents relative to its responses to Requests 7a through 7q. However, see Exhibit A hereto as well as the responses to Requests 1, 3, and 7 above. GE Medical Systems believes it has consulted with those employees reasonably likely to have information relevant to responding to this Request for Information.



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Response of General Electric Medical Systems Group  
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EXHIBIT A

Facility AA

4855 W. Electric Avenue  
Milwaukee, WI 53219  
EPA #WID 086 686 003

Chris Van Houton  
Project Manager  
Responsible for safety, environmental, and hazardous materials matters  
relating to the facility.

Harley Larson  
Plant Engineer - Environmental  
Responsibilities include safety, industrial hygiene, and environmental matters  
as they relate to this facility.

Facility BB

16555 Glendale Drive  
New Berlin, WI 53151  
EPA #WID 000 808 709

Lud Gerlovic  
Acting Supervisor, Maintenance & Facilities  
General responsibility for operation and maintenance of the facility as well  
as safety and environmental matters relating to the facility.

Facility CC

300/315 W. Edgerton Avenue  
Milwaukee, WI 53207  
EPA # WID 000 808 725

Dennis Hussey

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Exhibit A (Continued)

Facility DD

3000 N. Grandview Blvd.  
Waukesha, WI 53188  
EPA #WID 006 121 354

Rick Chiapete  
Safety and Environmental Specialist  
Responsible for safety and environmental programs, including monitoring  
disposal of hazardous wastes, at this facility.

Facility EE

16800 W. Ryerson Road  
New Berlin, WI 53151  
EPA #WID 000 808 717

Mark Woltanski  
CT Environmental Coordinator  
Responsible for industrial hygiene, environmental, and maintenance matters  
related to this facility.

Facility FF

515 Edgerton Avenue  
Milwaukee, Wisconsin 53207  
EPA #WID 073 838 534

Dennis Hussey  
This facility is no longer owned by GE Medical Systems. It was in operation  
until 1983.

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Response of General Electric Medical Systems Group  
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EXHIBIT B

Facility GG

National Distribution Center (Warehouse)  
16705 E. Lincoln Avenue  
New Berlin, WI 53151  
EPA # None

Facility HH

District Service Office  
2242 W. Bluemound Avenue  
Waukesha, WI 53186  
EPA # None

August 7, 1987

Response of General Electric Medical Systems Group  
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EXHIBIT C

Facility II

3114 N. Grandview Blvd.  
Waukesha, WI 53188  
EPA #WID 980 683 569

This facility was not in operation until September, 1982.

Facility JJ

3200 N. Grandview Blvd.  
Waukesha, WI 53188  
EPA #WID 981 090 426

This facility was not in operation unit until 1984.

Facility KK

430 W. Grange  
Milwaukee, WI 53207  
EPA # None

This facility was put into operation in 1983.

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EXHIBIT D

The attached documents are responsive to Requests 2, 7b, 7c, 7e, 7h, and 7n. Note that further purchase orders issued by GE Medical Systems to the persons identified in response to Request 3 through 1981 may be contained in dead storage in a warehouse leased by GE Medical Systems. If they exist, such purchase orders are stored and marked only by the year of their issuance. GE Medical Systems presently issues approximately 100,000 purchase orders per year, and issued a similar number in prior years. Therefore, it would be extremely burdensome and may be impossible for GE Medical Systems to locate any such purchase orders, if they exist, in response to this Request for Information.

**NOTE - SHADED AREAS FOR PURCHASING USE ONLY**

2. ACCOUNT NUMBER:

643-10-811

3 - DELIVER TO: DEPT # NAME, MAIL CODE

FUJIIHIRA W606

100-443887-100

## WEDDER DAYE

#### 4. RECOMMENDED VENDOR(S)

UNITED WASTE SYSTEMS

W 124 N 8925 BOUNDARY ROAD

MENTOMONEE FALLS, WI 53051

[illegible]

**6. CATEGORY**

### 7. SPECIAL INSTRUCTIONS

☒ EXPENSE

☐ DIRECT MAT.

AR #

8 - REQUESTED BY

DATE \_\_\_\_\_

MAIL CODE/PH. EXT.

9. APPROVAL SIGNATURE

DATE \_\_\_\_\_

**PH-EXT**

**DO NOT WRITE BELOW THIS LINE - FOR PURCHASING USE ONLY**

DE L'INSTRUMENT



MILWAUKEE, WISCONSIN 53201

1 PLANT LOCATION

W606/3759

NOTE - SHADED AREAS FOR PURCHASING USE ONLY

2 ACCOUNT NUMBER

644-10-811

3 DELIVER TO DEPT # NAME MAIL CODE

FUTHER W606

PLANT

P/O TYPE

PURCHASE ORDER NUMBER

VENDOR CODE

4 FIRMING (ATTENTION)

TAX % ORDER DATE

TERMS

F.O.B.

SHIP POINT

BUYER APPROVAL

4 - RECOMMENDED VENDOR(S)

UNITED WASTE

CONTAINER

1/1/80 THRU 12/31/80

TO BE INVOICED MONTHLY

BUDGET 18K

6 CATEGORY

7 SPECIAL INSTRUCTIONS

☒ EXPENSE☐ DIRECT MAT☐ A/R #

8 REQUESTED BY

DATE

MAIL CODE/PH. EXT.

9 APPROVAL SIGNATURE

DATE

PH. EXT.

DO NOT WRITE BELOW THIS LINE - FOR PURCHASING USE ONLY

DELIVERY DATE  
PROMISED

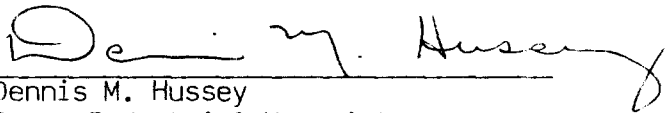


August 7, 1987

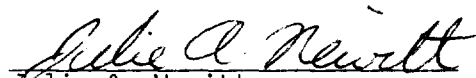
Response of General Electric Medical Systems Group  
to EPA Request for Information regarding Brookfield  
Sanitary Landfill.

AFFIDAVIT

This is to certify that in response to the EPA's Request for Information regarding the Brookfield Sanitary Landfill in Brookfield, Wisconsin dated June 23, 1987, commensurate with the time allotted, a diligent search of the records of GE Medical Systems and a diligent interviewing process with present employees of GE Medical Systems who may have knowledge of the operations, hazardous substance use, storage, treatment, disposal, and handling practices of GE Medical Systems has been conducted.

  
Dennis M. Hussey  
Group Industrial Hygienist  
Group Environmental Coordinator

On this 7th day of August, 1987 in  
the Country of Waukesha, State of  
Wisconsin, personally appeared before  
me Dennis M. Hussey, known to me and  
known to be the person who executed this  
document, and acknowledged that he executed  
the same.

  
Julie A. Newitt  
Notary Public

My commission expires July 21, 1991.